ESTTA Tracking number:

ESTTA719846 01/12/2016

Filing date:

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91224246
Party	Defendant Nella Chunky LLC
Correspondence Address	JOHN K PARK PARK LAW FIRM 3255 WILSHIRE BLVD, SUITE 1110 LOS ANGELES, CA 90010 UNITED STATES park@parklaw.com, trademark@parklaw.com
Submission	Request to Withdraw as Attorney
Filer's Name	John K Park
Filer's e-mail	park@parklaw.com, trademark@parklaw.com
Signature	/s/John K Park/
Date	01/12/2016
Attachments	Motion to Withdraw, PLF re Nella, Final.pdf(17588 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

PARAMOUNT PICTURES CORPORATION,	Cancellation No. 91224246
OPPOSER,	In The Matter of Trademark Application No.86/070,543
v.	Mark: ON WEDNESDAYS WE WEAR PINK!
NELLA CHUNKY LLC,	
APPLICANT.	

MOTION TO WITHDRAW

AS COUNSEL FOR APPLICANT NELLA CHUNKY LLC

Pursuant to 37 C.F.R. §§ 11.116(b), the law firm of Park Law Firm APC ("PARK LAW FIRM") hereby requests the Board's permission to withdraw as counsel for Applicant NELLA CHUNKY LLC. ("APPLICANT"). The grounds for withdrawal and facts supporting this request are as follows:

 PARK LAW was retained to represent APPLICANT in this matter under a certain Attorney-Client agreement. 2. APPLICANT sent a written request that PARK LAW is to withdraw from this present

proceeding and take no further actions toward this matter.

3. PARK LAW FIRM requests this motion to withdraw under 37 C.F.R. § 11.116(a)(3),

because APPLICANT has discharged PARK LAW FIRM." 37 C.F.R. § 11.116(a)(3).

4. Therefore, there are other good causes for withdrawal exists. 37 C.F.R. § 11.116(b)(7).

5. This request for withdrawal can be accomplished without material adverse effect on

APPLICANT, 37 C.F.R. §§ 11.116(b)(1): The PARK LAW FIRM is discharged and

the status of this proceeding is that Discovery closes as of July 13, 2016, giving

ample time for APPLICANT to adequately respond.

For the foregoing reasons, PARK LAW FIRM respectfully requests that it be granted

permission to withdraw as counsel for APPLICANT in this proceeding.

Respectfully submitted,

Dated: January 12, 2016 By: /John K. Park/

John K. Park

Attorneys for Applicant

Park Law Firm

3255 Wilshire Blvd. Suite 1110

Los Angeles, CA 90010

Tel: (213)389-3777

park@parklaw.com

2

CERTIFICATE OF SERVICE

I certify that a true copy of the attached MOTION TO WITHDRAW AS COUNSEL FOR APPLICANT NELLA CHUNKY LLC was served on APPLICANT NELLA CHUNKY LLC and the OPPOSER's Attorney of Record on January 12, 2016, via email as follows:

Thomas J. Mango
Cantor Colburn LLP
20 Church Street, 22nd Floor
Hartford, CT 06103
tmango@cantorcolburn.com
cwilkinson@cantorcolburn.com

NELLA CHUNKY LLC lightsoul7@gmail.com

Dated: January 12, 2016

By: /s /John K. Park/

John K. Park